

Leora Hochstein  
Executive Director  
Federal Regulatory



1300 I Street, NW, Suite 400 West  
Washington, DC 20005

Phone 202 515-2535  
Fax 202 336-7922  
leora.l.hochstein@verizon.com

June 9, 2005

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Telecommunications Services Inside Wiring, Customer Premises Equipment  
CS Docket No. 95-184; Implementation of the Cable Television Consumer  
Protection and Competition Act of 1992: Cable Home Wiring MM Docket No.  
92-260**

Dear Ms. Dortch:

Today, June 9, 2005, Leora Hochstein, Will Johnson, Mahasti Pourdastan, Rip Van Roekel, and Kelley Dunne of Verizon met with Bill Johnson, Deborah Klein, John Norton, Karen Kosar, John Kiefer and Alison Greenwald of the Media Bureau to discuss the costs and difficulty associated with accessing cable wiring located behind sheetrock in a multiple dwelling unit ("MDU").

Verizon discussed its positions as set forth in the Verizon Comments filed in the above proceeding. In addition, Verizon discussed the attached presentation, which includes cost data associated with cutting through sheetrock in an MDU for the purpose of accessing cable wiring.

Consistent with Commission rules, I am filing one electronic copy of this notice and request that you place it in the record of the above-referenced proceedings.

Sincerely,

A handwritten signature in cursive script, appearing to read "Leora Hochstein".

Attachment

cc: Bill Johnson  
Deborah Klein  
John Norton  
Karen Kosar  
John Kiefer  
Allyson Greenwald

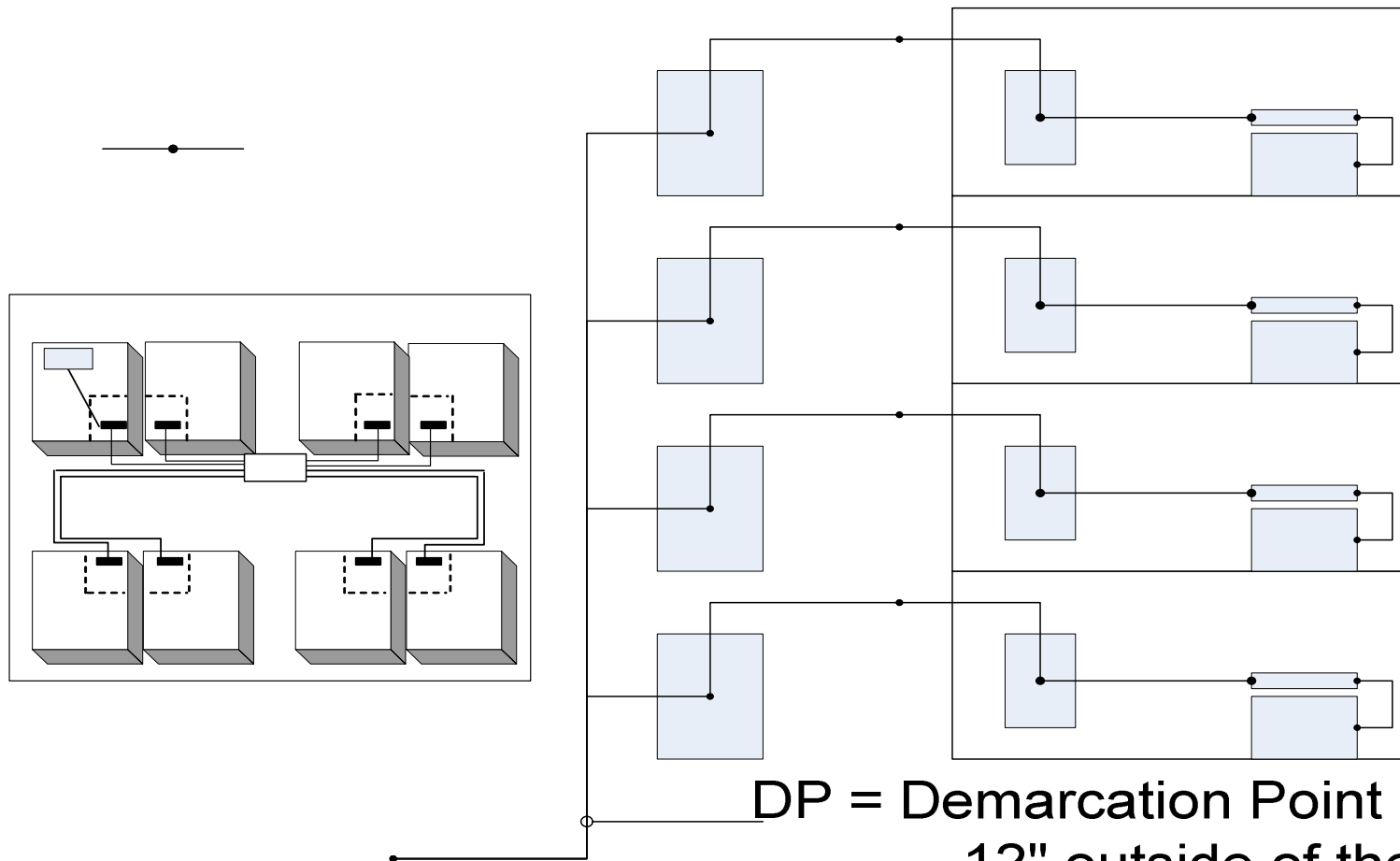


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# *The Accessibility of Cable Home Wiring Behind Sheetrock Walls and Ceilings*

*June 9, 2005*

# *Cable Home Wiring Diagram—Floor Plan*



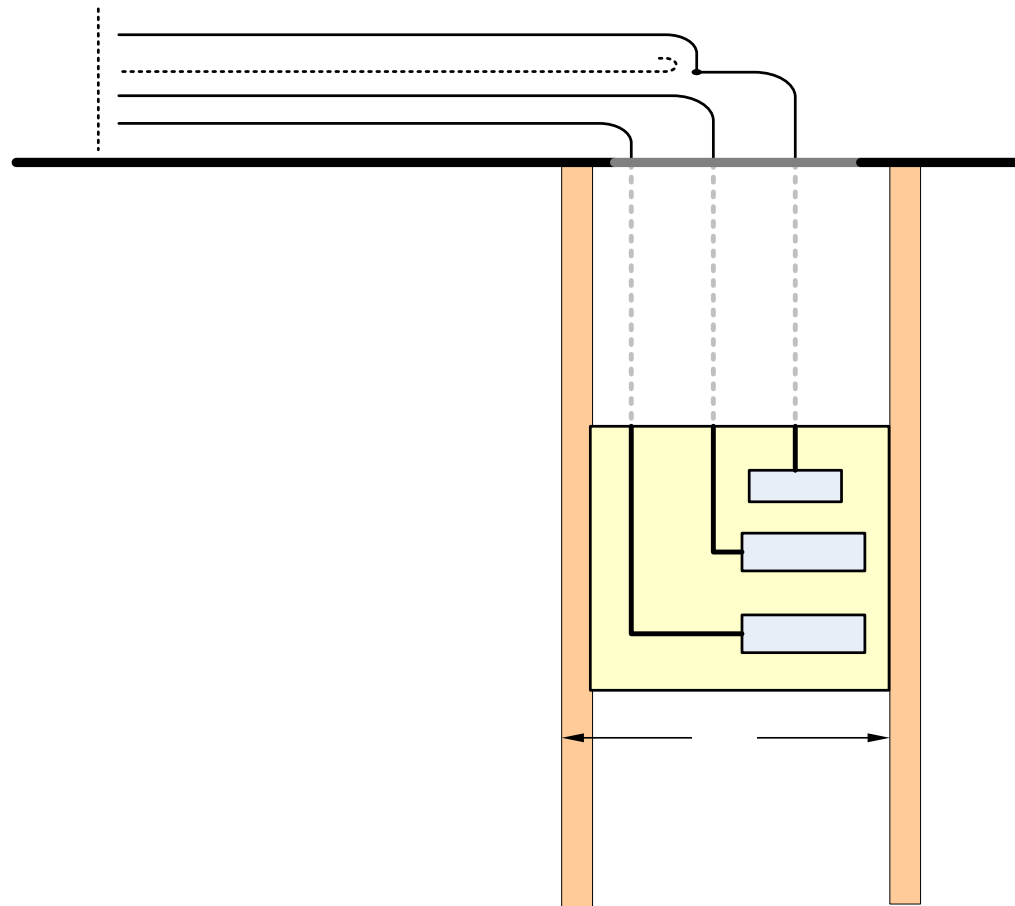
DP = Demarcation Point

12" outside of the living unit

VT = Video Tap

Point where cable becomes c

# *Cable Home Wiring Diagram*



## ***Costs of Accessing Demarcation Point behind Sheetrock***



- **Accessing wiring behind sheetrock requires significant modifications and/or damage to preexisting structural elements and leads to significant costs including:**
  - **Cable Locating Process:** Locate the wire behind wall or ceiling (site review, engineering, use of tone locating equipment, etc): \$30.00 per living unit.
  - **Hole Opening Costs:** Opening sheetrock to access wire (ceiling, floor, or wall): \$20.00 per opening
  - **Restoration of sheetrock:** \$200-\$1000 per living unit which includes multiple visits to:
    - close openings
    - tape
    - apply mud coating
    - sand
    - paint (wallpaper, faux finish, customer paneling, etc in many cases would be additional costs)

*Difficulty and Expense Varies by:  
MDU—Example #1*



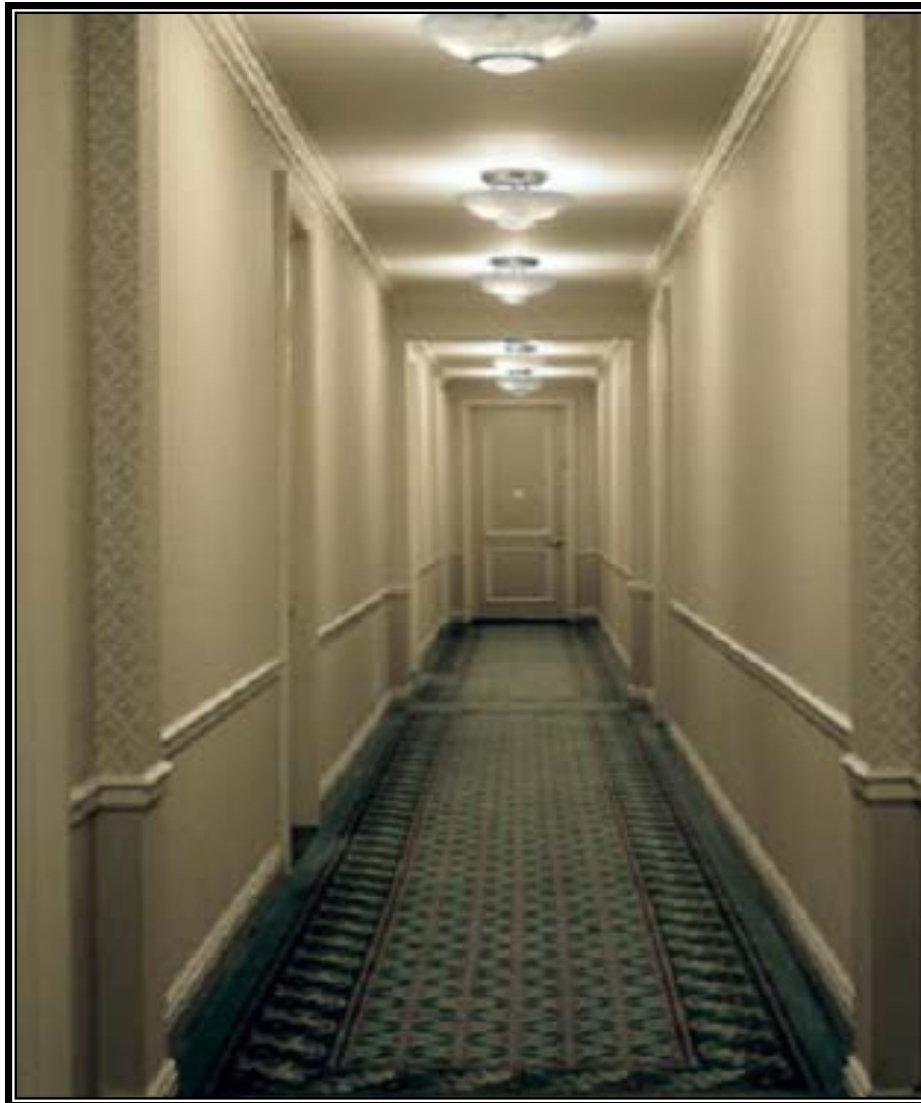
- Plain Ceiling
- Painted Wall
- No Carpet



## *MDU—Example 2*



- Plain Ceiling
- Wallpaper
- Carpet
- Crown molding



## *MDU—Example # 3*



- Intricate ceiling and walls
- Trim and molding
- Carpet



## *MDU Owner's Reluctance and Requirements*

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- Most MDU owners won't permit access.
  
- Common MDU owners' concerns:
  - Disturbance to residents.
  - Safety considerations.
  - Pathway generations.
  - Property restoration.

## *Conclusions*



- Going behind sheetrock -- a pre-existing structural element -- in order to access wiring is costly, disruptive and most often times simply not permitted.
- As a practical matter, competitive video providers have no access to wiring behind sheetrock given both the costs and the unwillingness of MDU owners to permit such access.
- Adopting a rule that a demarcation point cannot be located behind a wall or ceiling will facilitate competition among video service providers for MDU customers.